

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JESSE THOMAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>CASE NO. 1:07-cv-07131</b>
	)	
EXXON MOBIL CORP,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFFS' COMBINED MOTION TO DISMISS  
AND MOTION TO STRIKE DEFENDANT'S AFFIRMATIVE DEFENSES**

Defendant, Exxon Mobil Corporation<sup>1</sup> (hereinafter "Defendant"), by and through its undersigned counsel, respectfully requests an additional seven (7) days to file its response to Plaintiff's Combined Motion to Dismiss and Motion to Strike Defendant's Affirmative Defenses. In support of this motion, Defendant states as follows:

1. Plaintiff filed a Complaint against Defendant alleging retaliatory termination in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e *et seq.*
2. On April 11, 2008, Defendant filed its Answer and Affirmative Defenses to the Complaint.
3. On May 1, 2008, Plaintiff filed a Combined Motion to Dismiss and Motion to Strike Defendant's Affirmative Defenses.
4. On May 5, 2008, this Court entered an order setting forth a briefing schedule that required Defendant to file its response by May 30, 2008. Plaintiff's reply is due June 13, 2008.

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<sup>1</sup> Plaintiff is employed at ExxonMobil Lubricants & Petroleum Specialties Company, a division of Exxon Mobil Corporation.

5. On May 23, 2008, Defendant's lead counsel, Jan Michelsen, was informed that Jesse, her eleven year old golden retriever, had an aggressive sarcoma. Jesse was placed in the intensive care unit and Ms. Michelsen spent the weekend caring for her companion until she passed away.

6. As a result of Jesse's medical complications and passing, Ms. Michelsen was unable to devote her weekend, as planned, to responding to Plaintiff's Combined Motion to Dismiss and Motion to Strike.

7.. Plaintiffs' counsel has consented, without objection, to Defendant's request for an additional seven (7) days, until Friday, June 6, 2008, to file its response to the Motion. In kind, Defendant agrees that Plaintiff's reply date should be extended to Friday, June 20, 2008.

8. This request is not interposed for the purpose of delay, and no prejudice will result to any party from the granting of this request for an extension.

WHEREFORE, Defendant Exxon Mobil Corporation respectfully request that this Court granted it additional seven (7) days, until Friday, June 6, 2008, to file its response to Plaintiff's Combined Motion to Dismiss and Motion to Strike Defendant's Affirmative Defenses and that Plaintiff's reply date should be extended to Friday, June 20, 2008.

Respectfully submitted,

EXXON MOBIL CORPORATION

Dated this 27st day of May, 2008.

s/ Jennifer L. Colvin

Jan Michelsen, #18078-49  
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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on this 27th day of May, 2008 she electronically filed the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' COMBINED MOTION TO DISMISS AND MOTION TO STRIKE DEFENDANT'S AFFIRMATIVE DEFENSES with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Aaron B. Maduff  
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s/ Jennifer L. Colvin \_\_\_\_\_

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